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United States Attorney

2 HALLIE HOFFMAN (CABN 210020)
3 Chief, Criminal Division

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9 Attorneys for Plaintiff
UNITED STATES OF AMERICA

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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 OAKLAND DIVISION

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 v.
17 NAIFARM SAECHAO,
18 Defendant.

No. CR 16-00174 HSG

STIPULATION REGARDING DISMISSAL OF
CHARGES AND ORDER

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21 Plaintiff United States of America, by and through its counsel of record, the United States
22 Attorney for the Northern District of California and Assistant United States Attorney Garth Hire, and
23 defendant Naifarm Saechao (defendant), by and through his counsel of record, Joyce Leavitt, hereby
24 stipulate as follows:

25 1. On March 2, 2018, the United States Probation Office (USPO) filed an amended Form
26 12 alleging that defendant violated the conditions of his probation (Docket No. 71). The amended
27 Form 12 alleged four separate charges relating to the violations. On September 17, 2018, defendant
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1 admitted to Charges One and Four of the amended petition and on February 25, 2019, was sentenced
2 to 130 months' imprisonment to be followed by five years of supervised release.

3 2. The parties therefore agree that the remaining charges in the amended petition,
4 specifically, Charges Two and Three, should be dismissed.

5 IT IS SO STIPULATED.

6 Dated: April 22, 2019

DAVID L. ANDERSON
United States Attorney

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9 GARTH HIRE
Assistant United States Attorney

10 Attorneys for Plaintiff
UNITED STATES OF AMERICA
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13 /S/

4/22/19

14 JOYCE LEAVITT
Attorney for Defendant
15 Naifarm Saechao
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Date

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THEREFORE, FOR GOOD CAUSE SHOWN:

IT IS SO ORDERED.

DATE _____

STIPULATION REGARDING DISMISSAL 3
OF CHARGES AND ORDER
CR 16-00174 HSG